

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

R.M.S. TITANIC, INC.,  
successor in interest to Titanic  
Ventures, limited partnership,

Plaintiff,

v.

Civil Action No. 2:93cv902

The Wrecked and Abandoned  
Vessel, . . .believed to be  
the RMS TITANIC, in rem,

Defendant.

**PLAINTIFF R.M.S. TITANIC, INC.'S  
MOTION TO FILE PERIODIC REPORT EXHIBITS 1-6 UNDER SEAL**

Plaintiff RMS Titanic, Inc. ("RMST"), by counsel, pursuant to Rule 5 of the Local Civil Rules of the United States District Court for the Eastern District of Virginia, hereby moves to file Exhibits 1-6, including Exhibits 4A and 5A submitted to the Court on August 1, 2019, (Exhibits 1-6) under seal.

The six exhibits are as follows:

1. Assignment and Assumption Agreement dated February 13, 2019.
2. Restated Intercompany Services and Exhibition Touring Rights License Agreement, dated March 1, 2012.
3. Intercompany Agreement dated March 1, 2012.
4. Intercompany Services and Exhibition Touring Rights License Agreement dated July 29, 2019.
- 4A. Redline of Exhibit 4 comparing Exhibit 4 to its predecessor, Exhibit 2.

5. Intercompany Agreement dated July 29, 2019.

5A. Redline of Exhibit 5 comparing 5 to its predecessor, Exhibit 3.

6. List of 55 Titanic Artifacts on the Conservation and Curatorial Priorities List, prepared by Executive Director of Collections, Alex Klingelhofer.

For the reasons set forth in the accompanying Memorandum in Support, RMST respectfully requests that the Court grant this Motion to Seal and enter the Proposed Order attached hereto as Exhibit 1, sealing Exhibits 1-6, including Exhibits 4A and 5A.

Respectfully submitted,

R.M.S. TITANIC, INC.

By Counsel

/s David G. Barger

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CERTIFICATION

I hereby certify that the foregoing has been electronically filed through the Court's ECF system this 1st day of August, 2019.

R.M.S. TITANIC, INC.

By Counsel

/s David G. Barger

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